THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO WESTERN DIVISION

MAY 17 2021

CLERK, U.S. DISTRICT COURT TO FOLE OF THE OF T

STACY BROWN, on behalf of herself and others similarly situated, Plaintiff,	CASE NO.: 3:21-cv-801-JRK JUDGE JAMES R. KNEPP II
v. UNIVERSAL PROTECTION SERVICE, LLC,	
Defendant.	

MOTION FOR ADMISSION PRO HAC VICE OF ROBIN E. LARGENT

Pursuant to N.D. Ohio L. R. 83.5(h), Defendant Universal Protection Service, LLC ("Defendant") hereby respectfully moves this Court to grant leave for attorney Robin E. Largent to appear *pro hac vice* in this action as counsel for Defendant (the "Motion").

In support of this Motion and as set forth in the accompanying Declaration of Robin E. Largent in Support of Motion for Admission Pro Hac Vice (Exhibit A), the undersigned asserts the following:

- 1. Ms. Largent is a Partner at Martenson, Hasbrouck & Simon, LLP, which is located at 455 Capitol Mall, Suite 601, in Sacramento, California 95814. Her business telephone number is (916) 970-1430 and her business facsimile number is (916) 538-6524. Her email address is rlargent@martensonlaw.com.
- 2. The Declaration of Ms. Largent, which is offered under penalty of perjury pursuant to 28 U.S.C. § 1746 in support of this Motion and contains the specific information required by Local Rule 83.5(h), is attached hereto as Exhibit A.

Case: 3:21-cv-00801-JRK Doc #: 4 Filed: 05/17/21 2 of 4. PageID #: 34

3. As noted in her Declaration, Ms. Largent has been a member in good standing of

the highest court of the State of California since December 2, 1998. Her bar registration number

is 197595. No disciplinary proceedings have been filed or are pending against her, and she has

not been disbarred or suspended from practice before any court, department, bureau, or

commission of any State or the United States. Ms. Largent has never received any reprimand from

any such court, department, bureau, or commission pertaining to conduct or fitness as a member

of any bar.

4. This Motion is accompanied by the required \$120.00 fee.

WHEREFORE, Defendant Universal Protection Service, LLC respectfully requests that

this Court grant attorney Robin E. Largent limited admission to appear in this Court, in this

particular proceeding, on its behalf.

Dated: May 14, 2021

Respectfully submitted,

Robin E. Largent

rlargent@martensonlaw.com

MARTENSON, HASBROUCK & SIMON, LLP

455 Capitol Mall, Suite 601

Sacramento, California 95814

Telephone: (916) 970-1430 Facsimile: (916) 538-6524

racsillile. (910) 336-032

Attorneys for Defendant

UNIVERŠAL PROTECTION SERVICE, LLC

CERTIFICATE OF SERVICE

I am a citizen of the United States, more than eighteen years old, and not a party to this action. I am employed by the law firm Martenson, Hasbrouck & Simon LLP, and my business address is 455 Capitol Mall, Suite 601, Sacramento, California 95814.

On May 14, 2021, I served true copies of the following document(s):

MOTION FOR ADMISSION *PRO HAC VICE* OF ROBIN E. LARGENT in the following manner(s):

X	(By Priority Mail)	By placing said document(s) in a sealed envelope with postage thereon fully prepaid, for collection and mailing following our ordinary business practices. I am readily familiar with Martenson, Hasbrouck & Simon LLP's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.
	(By Email or E-Service)	By causing such document(s) to be emailed or electronically transmitted to the email addresses listed below, pursuant to a court order, an agreement of the parties, or other permissible reason.

on the following interested part(ies) in this action:

Matthew J. P. Coffman Adam C. Gedling 1550 Old Henderson Road, Suite 126 Columbus, Ohio 43220

Phone: (614) 949-1181 Fax: (614) 386-9964

Email: mcoffman@mcoffmanlegal.com agedling@mcoffmanlegal.com

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on May 14, 2021.

Pamela Spring

CERTIFICATE OF SERVICE

I am a citizen of the United States, more than eighteen years old, and not a party to this action. I am employed by the law firm Martenson, Hasbrouck & Simon LLP, and my business address is 455 Capitol Mall, Suite 601, Sacramento, California 95814.

On May 14, 2021, I served true copies of the following document(s):

MOTION FOR ADMISSION *PRO HAC VICE* OF ROBIN E. LARGENT in the following manner(s):

(By Priority N	Mail)	By placing said document(s) in a sealed envelope with postage thereon fully prepaid, for collection and mailing following our ordinary business practices. I am readily familiar with Martenson, Hasbrouck & Simon LLP's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.
(By Email or	E-Service)	By causing such document(s) to be emailed or electronically transmitted to the email addresses listed below, pursuant to a court order, an agreement of the parties, or other permissible reason.

on the following interested part(ies) in this action:

Matthew J. P. Coffman Adam C. Gedling 1550 Old Henderson Road, Suite 126 Columbus, Ohio 43220

Phone: (614) 949-1181 Fax: (614) 386-9964

Email: mcoffman@mcoffmanlegal.com agedling@mcoffmanlegal.com

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on May 14, 2021.

Pamela Spring